

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

FILED

APR 5 2000

NANCY DOHERTY; CLERK
BY Deputy

UNITED STATES OF AMERICA

V.

FLOYD OLLIS RICHARDS (2)

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CAUSE NO. 399-CR-084-X

DEFENDANT FLOYD OLLIS RICHARD'S SUPPLEMENT
OBJECTIONS TO THE PRE-SENTENCE REPORT

TO THE HONORABLE JOE KENDALL:

Comes now the Defendant, Floyd Ollis Richards and further objects to the Pre-sentence report and for cause would show:

I.

Defendant, Richards objects to the failure of Part E. factors that may Warrant Departure to include:

1. A \$5K2.0 downward departure for the reason stated in Defendant Lipscomb's motion for downward departure.
2. Although, mention is made of the liver transplant and the fact that Mr. Richards "has had some problems with liver rejection", the fact is that the problems are continuing and on going. The required regularity with which he sees doctors to monitor his blood and adjust medications would make incarceration, even in a medical facility a problem for the facility as well as Mr. Richard's recovery.

It is hoped that any sentence imposed be limited to

some confinement to accommodate the needs of society as well as Mr. Richard's need for his particularized medical treatment.

II.

Mr. Richards, although not worried about where his next meal will come from, would like the Court to take into consideration the following, which is not included in paragraph 56-58 concerning Mr. Richard's financial condition.

1. The cab companies owned by Mr. Richards, and subsequently his wife, have suffered losses of \$500,000 to a \$1,000,000.00 dollars over the last two years since the investigation of his companies was made public and his health declined making hands on day to day operation of these companies by Mr. Richards impossible.
2. Based on the investigation, indictment, plea by Mr. Richards, conviction of Mr. Lipscomb, the Fort Worth and Dallas City Councils have instituted action adversely affecting Richard's cab companies. In effect, they are forcing a sale of the companies at substantially below market value.

In short, Mr. Richard's has taken a financial bath as a result of these matters.

III.

Defendant Richards would also request a delay in the sentencing date for medical reasons. These facts have been made known to the Government and they do not object to the delay.


RESPECTFULLY SUBMITTED,



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CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing Motion has been hand delivered to the Assistant United States Attorney, Mike Uhl, the U.S. Probation office and Judge Kendall on this the 5th day of April, 2000.



Reed W. Prospere